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4 Beverly Hills, California 90211
5 (213) 659-9965

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8 Attorneys for Plaintiff and Cross-Defendant
9 CHURCH OF SCIENTOLOGY OF CALIFORNIA

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF LOS ANGELES

12 CHURCH OF SCIENTOLOGY OF)
13 CALIFORNIA, a California)
14 Corporation,)

15 Plaintiff,)

16 v.)

17 GERALD ARMSTRONG, et al.,)

18 Defendants.)

19 _____)
20 AND RELATED CROSS-ACTION.)
21 _____)

Case No. C 420153

(Severed Action)

REQUEST FOR PRODUCTION OF
DOCUMENTS FROM CROSS-
DEFENDANT CHURCH OF
SCIENTOLOGY OF CALIFORNIA
TO CROSS-COMPLAINANT
GERALD ARMSTRONG

22 TO GERALD ARMSTRONG AND TO HIS ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that pursuant to Code of Civil
24 Procedure, Section 2031, on November 3, 1986 at 10:00 a.m. at
25 the Law Offices of Peterson & Brynan, 8530 Wilshire Boulevard,
26 Suite 407, Beverly Hills, California 90211, Cross-Defendant
27 requests Cross-Complainant to produce for copying and
28 inspection by counsel for Cross-Defendant each of the documents
specified in Schedule A annexed hereto. Such items are
believed to be in Cross-Complainant's custody, control or
possession, not privileged, and relevant to the subject matter

1 of this action or reasonably calculated to lead to the
2 discovery of admissible evidence in this action.

3 PLEASE TAKE FURTHER NOTICE that, pursuant to the express
4 provisions of Code of Civil Procedure, Section 2031,
5 Cross-Complainant shall serve a written response, subscribed to
6 under oath to this Request within twenty (20) days after
7 service of this Request. Said sworn Response, pursuant to the
8 requirements of Section 2031(b), "shall identify the documents,
9 papers, books, accounts, letters, photographs, objects, and
10 tangible things falling within the categories specified in the
11 request which are in the possession, custody or control of the
12 responding party."

13 This Request calls for identification and production of,
14 and defines "documents" to mean, without limitation, the
15 following items, whether printed or recorded or reproduced by
16 any other mechanical process, including audio and/or visual
17 process, or written or produced by hand: agreements,
18 communications, city, state and/or federal governmental
19 proceedings and hearings, transcripts and reports,
20 correspondence, telegrams, memoranda, summaries of records of
21 telephone conversations or interviews, diaries, graphs,
22 reports, notebooks, note charts, plans, summaries or records of
23 meetings or conferences, summaries or reports of investigations
24 or negotiations, opinions or reports of counsel, consultants,
25 photographs, tape recordings, cassettes, motion picture or
26 television films, brochures, pamphlets, advertisements,
27 circulars, press releases, articles or any publications,
28 drafts, files, letters, any marginal comments appearing on any

1 document, computer printouts and all other writings, or printed
2 materials.

3 DATED: October 2, 1986

Respectfully submitted,

4 PETERSON & BRYNAN

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By: 

JOHN G. PETERSON

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SCHEDULE A

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2 1. Produce originals or complete copies of any and all
3 books, manuscripts, articles, stories, poems, or drafts of any
4 of the aforesaid, written by you from 1980 to the present.

5 2. Produce originals or complete copies of any and all
6 books, manuscripts, articles, stories, poems, or drafts of any
7 of the aforesaid, written by you from 1970-1980.

8 3. Produce your original copies of the pamphlets, books
9 and booklets listed in Paragraph 10 of your Third Amended Cross-
10 Complaint For Damages.

11 4. In the event you do not intend to introduce as
12 evidence at the trial of this matter your original copy of each
13 of the pamphlets, books, and booklets described in Paragraph 10
14 of your Third Amended Cross-Complaint, produce the actual copies
15 of those pamphlets, books and booklets you do intend to
16 introduce as evidence.

17 5. Produce originals or copies of all of your cancelled
18 checks from 1975 to the present. Please note, you may, if so
19 desired, redact the name of the payee and bank account number
20 from each of the checks produced pursuant to this request.

21 6. Produce any and all drawings, paintings, charcoals,
22 sketches, or other artistic works you have created from 1980 to
23 the present.

24 7. Produce any and all of your medical, dental,
25 psychiatric and/or psychological records from 1960 to the
26 present. If you no longer possess such records, produce signed
27 medical release authorizations addressed to each treating
28 medical, dental, psychiatric and/or psychological professional,

1 and each hospital, clinic, or other facility where you received
2 medical, dental, psychiatric and/or psychological treatment for
3 those same years.

4 8. Produce any and all of your educational records from
5 1960 to the present. If you no longer possess such records,
6 produce signed educational release authorizations addressed to
7 each educational institution you attended for the same years.

8 9. Produce any and all correspondence from members of your
9 immediate family, including, but not limited to, your mother,
10 father, brothers, sister, and/or wives, to you from 1970 to the
11 present.

12 10. Produce any and all copies of any correspondence from
13 you to members of your immediate family, as are more fully
14 described in Request No. 9 above, that is currently in your
15 possession or which you can readily obtain access to.

16 11. Produce any and all correspondence in your possession
17 to or from you and any of the following persons: Laurel
18 Sullivan, Omar Garrison, Joseph Flanagan, La Venda Van Schaick
19 (Dukoff), Eddie Walters, Tonja Burden, Howard Schomer, Jim
20 and/or Nancy Dincalci, Mike and/or Kima Douglas, Bent Corydon,
21 Julie Christofferson-Titchbourne, Martin Samuels.

22 12. Produce any and all tape recordings, whether cassettes
23 or reel to reel, in your possession, custody or control which
24 depict the voices of any present or former members of the
25 Church of Scientology and which concern or relate in any way to
26 the Church of Scientology and/or L. Ron Hubbard.

27 13. Produce copies of your income tax returns for each
28 year from 1966 to the present.

1 14. Produce the original or complete copies of each and
2 every document which you allege is defamatory of you and which
3 you intend to rely upon at the trial of this matter.

4 15. Produce the original or copies of each and every
5 insurance claim you have filed with any insurer or insurance
6 company from 1980 to the present.

7 16. Produce any and all bank statements for all bank
8 accounts or trust accounts standing in your name alone or your
9 name along with others in the States of California,
10 Massachusetts, Oregon, or in Canada from 1980 to the present.

11 17. Produce copies of all stock certificates, bonds,
12 certificates of deposit and/or bank books presently standing in
13 your name, either individually or jointly with some other
14 person.

15 18. Produce the original or a complete copy of the small,
16 black book which you carried on November 7, 1984 as depicted in
17 the videotape recording of you exhibited during the trial of
18 Christofferson v. Church of Scientology.

19 19. Produce the original of any and all diaries or daily
20 reminders or other such notebooks which you have made from 1975
21 to the present.

22 20. Produce any and all lists of potential book titles
23 which you have made.

24 21. Produce any and all correspondence between you and
25 any book publisher, magazine editor, or movie producer or
26 studio.

27 22. Produce any and all contracts or proposed contracts
28 between you and any book publisher, magazine editor, or movie

1 producer or studio.

2 23. Produce true, accurate, and complete copies of each
3 and every document upon which you intend to rely to demonstrate
4 or prove the "written directives and polic[ies]" alleged in
5 Paragraph 9 of your Third Amended Cross Complaint.

6 24. Produce receipts for each book, booklet or pamphlet as
7 described in Paragraph 10 of your Third Amended Cross Complaint
8 which you claim to have purchased.

9 25. Produce true and accurate copies of each and every
10 Suppressive Person Declare made or issued by Defendant against
11 you upon which you intend to rely at the trial of this matter.

12 26. Produce each document identified in your answer to
13 Cross-Defendant's Interrogatory to Cross-Complainant No. 1(b),
14 served herewith.

15 27. Produce each document identified in your answer to
16 Cross-Defendant's Interrogatory to Cross-Complainant No. 4(c),
17 served herewith.

18 28. Produce each document identified in your answer to
19 Cross-Defendant's Interrogatory to Cross-Complainant No. 5(c),
20 served herewith.

21 29. Produce each document identified in your answer to
22 Cross-Defendant's Interrogatory to Cross-Complainant No. 6(c),
23 served herewith.

24 30. Produce each document identified in your answer to
25 Cross-Defendant's Interrogatory to Cross-Complainant No. 7(c),
26 served herewith.

27 31. Produce each document identified in your answer to
28 Cross-Defendant's Interrogatory to Cross-Complainant No. 8(c),

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served herewith.

32. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 9(c), served herewith.

33. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 10(d), served herewith.

34. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 11(c), served herewith.

35. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No.19, served herewith.

36. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 20, served herewith.

37. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 21, served herewith.

38. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 29, served herewith.

39. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 31(c), served herewith.

40. Produce each document identified in your answer to Cross-Defendant's Interrogatory to Cross-Complainant No. 32, served herewith.

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41. Produce receipts for each course or counselling ("auditing") which you claim to have purchased from any Church of Scientology.

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing _____ and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on _____, 19____, at _____ California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT (other than summons and complaint)

Received copy of document described as _____

on _____ 19____.

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES I am employed in the county of _____ State of California.

I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Suite 407, Beverly Hills, CA. 90211

On Oct. 2 1986 I served the foregoing document described as Request for Production of Documents From Cross-Defendant Church of Scientology of California to Cross Complainant Gerald Armstrong on see below

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at: _____ addressed as follows.

Julia Dragojevic
CONTOS&BUNCH
5855 Topanga Canyon Blvd.
Suite 400
Woodland Hills, CA. 91367

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail. Executed on _____, 19____, at _____, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on Oct. 2 1986, at Los Angeles, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Signature